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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO RESPONSE
TO PLAINTIFF'S LIST OF ALLEGED
DISCOVERY MISCONDUCT**

Courtroom: 8
Judge: Hon. William Alsup
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:
1. Declaration of Hong-An Vu
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this motion for an order to file under seal its Response to Plaintiffs’ List of Alleged Discovery Misconduct (the “Response”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal
Exhibit 2	Entire Document

The above referenced document was produced by Otto Trucking as non-confidential, but in an abundance of caution, Otto Trucking is submitting this exhibit under seal because the transcript during which Exhibit 2 was produced is still provisionally marked as Highly-Confidential – Attorneys’ Eyes Only.

Otto Trucking maintains that Exhibit 2 does not need to be filed under seal. However, Otto Trucking anticipates that Waymo will file a declaration in accordance with Local Rule 79-5 if it has a basis to seal Exhibit 2 despite its public disclosure of the contents of Exhibit 2.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Response and its supporting documents that merit provisional sealing.

Dated: August 24, 2017

Respectfully submitted,

By: /s/ Hong-An Vu

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **August 25, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **August 25, 2017**.

/s/ Hong-An Vu
HONG-AN VU